

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

OBED BROWN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:17-cv-00866 HEA
	)	
EXPRESS SCRIPTS,	)	
	)	
Defendant.	)	

**MOTION TO SEAL**

Defendant, Express Scripts Services Company,<sup>1</sup> by its undersigned counsel and pursuant to Local Rule 83-13.05(A), moves this Court to seal the following pleadings in the above-captioned matter:

- Doc. 69, Plaintiff’s Reply to Defendant’s Brief.

1. On March 9, 2017, Plaintiff Obed Brown (“Plaintiff”) filed a Complaint against Defendant.

2. Plaintiff’s filings since her Complaint have contained various personal and sensitive allegations regarding non-party individuals, as well as other confidential information. As a result, Defendant previously moved to seal numerous filings by Plaintiff. *See* Doc. 29; Doc. 36; Doc. 52; Doc. 61; Doc. 65. The Court granted those Motions in December 2017, June 2018, and August 2018. *See* Doc. 32; Doc. 37; Doc. 54; Doc 63; Doc. 68.

3. On August 20, 2018, Plaintiff filed a Reply to Defendant’s Brief. *See* Doc. 69.

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<sup>1</sup> Plaintiff incorrectly identifies Defendant as “Express Scripts.” Plaintiff was employed by Express Scripts Services Company.

4. Plaintiff's Reply included unsubstantiated, highly-inflammatory allegations, similar to those found in her previous filings, including allegations of rape and assault by Defendant's employees, who are not parties in the above-referenced matter.

5. In order to protect the personal information of and prevent any harm to the named non-party individuals, it is necessary for the Court to seal the above-listed pleadings and exhibits in this matter.

WHEREFORE, Defendant Express Scripts Services Company respectfully requests an Order sealing the above-listed pleading and for such other necessary relief as the Court deems appropriate.

Respectfully submitted,

**OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.**

/s/ Eric A. Todd

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 22, 2018, a copy of the foregoing was sent via electronic mail and U.S. Mail to the following:

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